

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI**

MISSOURI STATE CONFERENCE OF )  
THE NATIONAL ASSOCIATION FOR )  
THE ADVANCEMENT OF COLORED )  
PEOPLE, REDDITT HUDSON, )  
F. WILLIS JOHNSON and )  
DORIS BAILEY, )

Plaintiffs, )

v. )

Civ. No. 4:14-cv-02077-RWS

FERGUSON-FLORISSANT SCHOOL )  
DISTRICT and ST. LOUIS COUNTY )  
BOARD OF ELECTIONS )  
COMMISSIONERS, )

Defendants. )

**PLAINTIFFS' MOTION FOR INTERIM RELIEF**

Plaintiffs the Missouri State Conference of the National Association for the Advancement of Colored People, Redditt Hudson, F. Willis Johnson, and Doris Bailey (collectively, "Plaintiffs") respectfully move this Court to grant their motion for interim relief. For the reasons explained in Plaintiffs' memorandum in support, should this Court find that the at-large method for electing Ferguson-Florissant School Board members violates Section 2 of the Voting Rights Act of 1965, 52 U.S.C. § 10301, interim relief in the form of a short delay of the upcoming election scheduled for April 5, 2016 until the next practicable date on which elections are currently scheduled to take place (either the August 2, 2016 statewide primary or the November 8, 2016 general election) to provide an opportunity to craft and implement a permanent remedy is appropriate because the irreparable harm to members of the FFSD community of holding an election under an unlawful election scheme outweighs any potential inconvenience to Defendants.

WHEREFORE, Plaintiffs request this Court grant Plaintiffs' request for interim relief.

Respectfully submitted,

/s/ Anthony E. Rothert

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**CERTIFICATE OF SERVICE**

I, Anthony E. Rothert, hereby certify that on December 2, 2015, I filed the foregoing document using the e-filing system, thereby serving electronic copies via email to all named parties below:

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